

One Batterymarch Park, Suite 405 Quincy MA 0219 (617) 786-8800

November 28, 2005

VIA ECFS

Ms. Marlene H. Dortch Federal Communications Commission 445 12th St. S.W. Washington, D. C. 20554

Re: Atlantic Broadband Voice Over Internet Protocol 911 Compliance Letter

WC Docket No. 04-36 WC Docket No. 05-196

Dear Ms. Dortch:

Atlantic Broadband Finance LLC, together with its operating companies, Atlantic Broadband (Penn) LLC Atlantic Broadband (Miami) LLC, (collectively "Atlantic Broadband" or "the company") makes this filing in response to the Federal Communications Commission's (FCC) reporting requirements in its *VoIP E911 Order* and subsequent *Public Notice*.¹

As of this date, Atlantic Broadband does not provide voice over Internet Protocol ("VoIP") service to any customers; therefore we do not believe that we are required to make any filing under the terms of the *VoIP 911 Order* or the *Public Notice*. Atlantic Broadband does intend, however, to offer such services in the near future. Therefore, in an abundance of caution, Atlantic Broadband provides the following information relative to its

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¹ *IP Enabled Services and 911 Requirements for IP-Enabled Service Providers*, First Report and Order and Notice of Proposed Rulemaking, 20 FCC Rcd 10245 (2005) ("VoIP 911 Order"):Enforcement Bureau Outlines Requirements of November 28, 2005 Interconnected Voice Over Internet Protocol 911 Compliance Letters, Public Notice, DA 05-2945 (rel. Nov. 7, 2005) ("Public Notice").

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future plans for implementation of enhanced 911 requirements for interconnected VoIP service providers. The information provided here relies on information provided by Atlantic Broadband's vendors.

<u>911 Solution:</u> The attached document entitled "Atlantic Broadband (AB) – E911 Coverage Information" includes quantification, on a percentage basis, of the number of subscribers to whom the company is able to provide 911 services in compliance with the rules established in the VoIP 911 Order.

911 Routing Information/Connectivity to Wireline E911 Network. As indicated in the attached document entitled "Atlantic Broadband (AB) – E911 Coverage Information," customer calls will be routed to the appropriate PSAP utilizing the Selective Router.

Transmission of ANI and Registered Location Information. As indicated in the attached document entitled "Atlantic Broadband (AB) – E911 Coverage Information," customer calls will be routed to the appropriate PSAP utilizing the Selective Router. Accordingly, Atlantic Broadband provides the following information as requested in the Public Notice issued November 7, 2005: (i) 100% of answering points within the company's current VoIP service area are capable of receiving and processing ANI and Registered Location information that the provider transmits; (ii) 100 % of customers' ANI and Registered Location will be transmitted to answering points that are capable of receiving and processing this information; and (iii) Atlantic Broadband will be transmitting the caller's ANI and registered location to all answering points that are capable of receiving, processing and utilizing this information.

911 Coverage. Not applicable

Obtaining Initial Registered Location Information Atlantic Broadband has established a service order process to obtain the Registered Location for each new subscriber, which will apply to 100% of service activations at such time as the Company offers service.

Obtaining Updated Registered Location Information If customers relocate within Atlantic Broadband VoIP service territory, they must update their Registered Location Information by contacting Atlantic Broadband. Customers are only permitted to use their service from their Registered Location, and the service does not support general nomadic use. All customers will be informed of the means to relocate and update information in the initial service order process, in the Customer Guide, in the Service Agreement, and in the 911 Disclosure Statement.

<u>Technical Solution for Nomadic Subscribers</u> Atlantic Broadband does not intend to offer a nomadic service at this time, and its service is not designed to support nomadic use.

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Please do not hesitate to contact me should you have any questions or concerns.

Sincerely, Bartlett F. Leber

/s/ bfl

Vice President & General Counsel bleber@atlanticbb.com



Atlantic Broadband (AB) – E911 Coverage Information

					non- E911-	
		Status	Selective			
MSO	Switch	23-Nov	Routers	PSAPs	PSAPs	Comments
	AB Total		2	2	0	100% E911 (= 2/2)
AB	Altoona	In-Service	2	2	0	
AB	Miami	Not Deployed	1	1	0	